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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JOHN MEGGS,

15 Plaintiff,

16 vs.

17 SUN SHENG INVESTMENT LLC,

18 Defendant

Case No.: 2:23-cv-01051-APG-BNW

JOINT STIPULATION TO EXTEND TIME
TO EXTEND DEADLINES (First Request)

20 Plaintiff, JOHN MEGGS (hereinafter “Plaintiff”), by and through his counsel of record,
21 ROBERT P. SPRETNAK, ESQ. of the LAW OFFICES OF ROBERT P. SPRETNAK, and
22 ANTHONY J. PEREZ, ESQ. of the LAW FIRM OF ANTHONY J. PEREZ LAW GROUP,
23 PLLC, and Defendant SUN SHENG INVESTMENT LLC by and through their counsel of record,
24 DORIS NEHME-TOMALKA, ESQ. of NEHME-TOMALKA & ASSOCIATES, stipulate as
25 follows:
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1 The Parties stipulate that the deadline for expert disclosures, which is currently set for
2 June 6th, 2024, is extended by sixty (60) days to August 5th, 2024. The Parties stipulate that the
3 deadline for Rebuttal Expert Disclosures which is presently July 8th, 2024, is extended by sixty
4 (60) days to September 6th, 2024. The Parties stipulate that the deadline to Extend Discovery
5 which is presently July 15th, 2024 is extended by sixty (60) days to September 13th, 2024. The
6 Parties stipulate that the deadline to complete discovery, which is presently August 5, 2024, is
7 extended by sixty (60) days to October 4th, 2024. The Parties further stipulate that the deadline
8 to file dispositive motions which is currently set for September 4th, 2024, is extended by sixty
9 (60) days to November 4th, 2024. The Parties further stipulate that the deadline to file a Pretrial
10 Order, which is currently set for October 4th, 2024, is extended by sixty (60) days to December
11 3rd, 2024. This is the first stipulation as to these deadlines. The Parties require additional time to
12 conduct a proper inspection at a time when Plaintiff's counsel can travel to attend the inspection,
13 as undersigned counsel is out of state. Defendant SUN SHENG INVESTMENT LLC
14 communicated to Plaintiff's counsel that she also has pre-planned dates that she anticipates being
15 out of the jurisdiction in the coming weeks. Counsel have been cooperating with one another
16 and will continue to cooperate to schedule inspections and other discovery as may be needed.
17 Moreover, the Parties would like to have additional time to conduct discovery and discuss the
18 possibility of a global resolution without the need to engage in additional litigation.
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24 Therefore, the Parties request that the Court extend the remaining deadlines by sixty (60)
25 days as discussed herein.
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1 DATED: June 6, 2024
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5 RESPECTFULLY SUBMITTED,
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8 /s/ Anthony J. Perez
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29 *Attorney for Plaintiff John Meggs*

30 /s/ Doris Nehme-Tomalka
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